IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA,

.

Plaintiff. : Civil Action No.: 18-15099 (ZNQ)(LHG)

v.

SHANT HOVNANIAN, et al.

Defendants.

......

<u>DEFENDANTS PACHAVA ASSET TRUST AND VSHPHH TRUST</u>
<u>NOTICE OF MOTION FOR STAY PENDING APPEAL</u>

PLEASE TAKE NOTICE that Defendants Pachava Asset Trust and VSHPHH Trust, by and through their counsel, John M. Hanamirian of the Hanamirian Law Firm, P.C., shall move before the United States District Court for the District of New Jersey on March 20, 2023 or as soon thereafter as the matter may be heard, for an order Granting their Motion for Stay Pending Appeal.

Defendants Pachava Asset Trust's and VSHPHH Trust's Memorandum of Law in Support of their Motion for Stay Pending Appeal is attached hereto and incorporated herein. A proposed form of Order is also attached hereto.

Dated: 2 21 23

John M. Hanamirian, Esquire

HANAMIRIAN LAW FIRM, P.C.

40 E. Main Street

Moorestown, New Jersey 08057

(856) 793-9092 - t

(856) 793-9121 - f

jmh@hanamirian.com

Attorney for Defendants Pachava Asset

Trust and VSHPHH Trust